

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION

MDL No. 2:18-mn-2873-RMG

**This Document Relates to
ALL CASES**

**JOINT MOTION FOR EXTENSION OF TIME TO SUBMIT A PROPOSED CMO
REGARDING TIER 2 PERSONAL INJURY BELLWETHER PROCEEDINGS**

Pursuant to Local Civ. Rule 6.01 (D.S.C.), Co-Lead Counsel for Plaintiffs and Defendants respectfully move this Court for a brief extension of time to submit proposals for a Case Management Order regarding Tier 2 Personal Injury Bellwether proceedings. This Motion is based on the following grounds:

1. Pursuant to CMO 26.C, the Parties were to submit a proposed Case Management Order regarding Tier 2 Personal Injury Bellwether proceedings by no later than eight (8) weeks prior to the end of the Tier 1 Discovery period.

2. The Parties previously filed a joint motion requesting an extension of time until April 24, 2024 to allow them to attempt to reach agreement on a proposed Case Management Order regarding Tier 2 Personal Injury Bellwether Proceedings. Dkt. 4831. The Court has not yet ruled on this motion.

3. The Parties have continued to discuss competing proposals and will continue to attempt to reach agreement where possible, but the Parties anticipate that there will likely be disputes for the Court to resolve.

4. To enable the Parties to have a further opportunity to confer and prepare the necessary submissions on any disputes, the Parties now request an extension of seven days to

submit competing proposals for the Court's consideration.

5. The Parties' propose to submit their proposals simultaneously at 7:00pm ET on May 1, 2024. Each proposal will be accompanied by a supporting brief not to exceed 12 pages in length.

6. The Parties continue to meet and confer as to whether briefs in response to the other side's submission would be necessary and intend to advise the Court of their positions on this issue by no later than 5:00pm ET on May 3, 2024.

7. The requested extension will not affect any existing deadlines. Given the importance of these issues, the Parties jointly request the Court to grant the requested extension and the proposed briefing process.

WHEREFORE, Co-Lead Counsel for Plaintiffs and Defendants respectfully request that the Court extend the time for the parties to submit proposals for a Case Management Order regarding Tier 2 Personal Injury Bellwether proceedings to May 1, 2024.

Dated: April 24, 2024

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